

10-29-84

DECLARATION OF GERALD ARMSTRONG

I, GERALD ARMSTRONG, declare and state the following:

1. I joined the CHURCH OF SCIENTOLOGY in 1971. I was a member of the elite Sea Organization ("Sea Org") of the CHURCH OF SCIENTOLOGY OF CALIFORNIA from February 1971 to December 1981. The Sea Organization is the paramilitary wing composed of the most dedicated Scientologists. L. RON HUBBARD's personal staff were drawn from the Sea Org members.

2. In February 1971 I went to work for L. RON HUBBARD. I worked for L. RON HUBBARD until I left the Scientology organization in December 1981. During most of this time I worked physically with L. RON HUBBARD.

3. I have held at least the following positions in Scientology organizations: Intelligence Officer, Deputy L.R.H., External Communications Aide, Deputy Commanding Officer of L. RON HUBBARD's Household Unit and L. RON HUBBARD's Biography Researcher.

4. L. RON HUBBARD has, on several occasions in the past ten years, moved his residence at short notice because of his fear of being indicted on criminal charges or being served with civil process. To insure that L. RON HUBBARD's whereabouts are kept secret, guards are posted at his residence, and all guards, his personal staff and Scientologists near him are trained and

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1 drilled to obstruct process servers and lie about L. RON HUBBARD's  
2 whereabouts and their relationship to him.

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4 5. L. RON HUBBARD fled from his Hemet, California  
5 location in March of 1980 because it was again determined that his  
6 whereabouts might be known to litigants seeking to serve summons  
7 or subpena.

8  
9 6. It has been the policy and practice of those  
10 persons in senior positions in Scientology to lie about L. RON  
11 HUBBARD's involvement with Scientology, his control of Scientology  
12 operations and finances, and his whereabouts, even from other  
13 Scientologists. I had firsthand knowledge of an operation by the  
14 CHURCH OF SCIENTOLOGY OF CALIFORNIA's Guardian Office to plant a  
15 false story in the international press that L. RON HUBBARD was  
16 planning to buy an estate in Ireland. This was done to cover up  
17 the fact that L. RON HUBBARD was planning on establishing a  
18 residence in California.

19  
20 7. In 1981 I personally know that L. RON HUBBARD  
21 ordered a special "mission" composed of Commodore Messenger  
22 Organization ("CMO" explained further below) members to establish  
23 an "all clear date." This would be the date when all court cases  
24 involving him had been won or the charges dropped so it would be  
25 safe for him to come out of hiding and return to Gilman Hot-  
26 springs. At one point the date set was October 1981, later moved  
27 back to December 1981.

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1           8.    The Commodore's Messenger Organization ("CMO") is  
2 the group of Sea Organization personnel from the CHURCH OF SCIEN-  
3 TOLOGY who act as messengers for L. RON HUBBARD (the "Commodore").  
4 Their function was to relay and enforce L. RON HUBBARD's orders.  
5 CMO is L. RON HUBBARD's method of controlling all Scientology  
6 organizations because of written Scientology policy that his  
7 orders cannot be defied. The CMO headquarters, until the time I  
8 left in December 1981, was located at the Gilman Hotsprings  
9 property.

10  
11           9.    The CMO was still able to communicate with L. RON  
12 HUBBARD even after 1980 when he went into further hiding from all  
13 but a few close staff.

14  
15           10.   After 11 years of working with Scientology and  
16 L. RON HUBBARD I became aware that L. RON HUBBARD, through the Sea  
17 Organization, the CMO and the Guardian's Office of the CHURCH OF  
18 SCIENTOLOGY (now known as Office of Special Affairs, or OSA) had  
19 complete control of the assets and activities of all Scientology  
20 organizations throughout the world. The CMO in the United States  
21 and the OSA, pursuant to L. RON HUBBARD's authority, has absolute  
22 control of all Scientology missions and other organizations in the  
23 United states.

24  
25           11.   L. RON HUBBARD's control was effectuated through a  
26 personal communications unit that received daily telexes and other

27    ///

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1 communications from the various Church of Scientology organiza-  
2 tions throughout the world.

3  
4 12. In January 1984, a Scientology organization, Golden  
5 Era Studios, created, sold and distributed through Scientology  
6 outlets an audio cassette entitled "Ron's Journal 38: Today and  
7 Tomorrow--The Proof", identifying it as a very recent recording of  
8 L. RON HUBBARD talking to Scientologists. The cassette is copy-  
9 righted in the name of L. RON HUBBARD. I have heard the record-  
10 ing, wherein L. RON HUBBARD states that he is in computer  
11 communication with Scientology organizations internationally and  
12 is able to receive data and communications from virtually every  
13 Scientology organization in the world via the computer network of  
14 the Churches of Scientology.

15  
16 13. In one period during my involvement with the CHURCH  
17 OF SCIENTOLOGY, I worked in L. RON HUBBARD's personal communica-  
18 tions unit. As part of my job, I relayed mail and telexes between  
19 L. RON HUBBARD and various Scientology organizations throughout  
20 the world. I became aware that L. RON HUBBARD had absolute  
21 control of all large corporate bank accounts and that he, alone,  
22 had the authority to order withdrawals of large amounts from these  
23 accounts. He controlled these accounts through various people who  
24 work directly for him. Neither the directors of the CHURCH OF  
25 SCIENTOLOGY OF CALIFORNIA nor any other Church of Scientology  
26 executives had such authority or control.

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1           14. It was common knowledge among senior executives of  
2 the organization and is the policy of the CHURCH OF SCIENTOLOGY  
3 that members of the Boards of Directors of the various Scientology  
4 corporations are mere figureheads without authority or control,  
5 and that control really vests in L. RON HUBBARD. I have personal  
6 knowledge that in order to carry out this corporate fraud, organi-  
7 zational executives have engaged in various unethical practices  
8 including back dating phony board minutes and forging signatures.  
9

10           15. Although L. RON HUBBARD's legal representatives  
11 claim that he has not been paid by Scientology other than a  
12 \$50,000 annual consultant's fee and the receipt of royalties from  
13 the sale of his books, the fact is that he has absolute control of  
14 all Scientology accounts. For example, in 1980, he authorized the  
15 expenditure of unlimited Scientology funds for a project to get  
16 him a Nobel Prize, and CHURCH OF SCIENTOLOGY OF CALIFORNIA funds  
17 were used to refurbish and outfit the Gilman Hotsprings property  
18 for L. RON HUBBARD's home and office.  
19

20           16. Because of such control, L. RON HUBBARD received  
21 millions of dollars through a dummy corporation (Religious  
22 Research Foundation, or R.R.F.) that was specifically set up to  
23 funnel money to him which should have been paid to the CHURCH OF  
24 SCIENTOLOGY OF CALIFORNIA by foreign customers.  
25

26           17. During my 11 years as a member of the Sea Organi-  
27 zation or in L. RON HUBBARD's personal office staff, I became  
28 aware of a continuous pattern of fraudulent statements and conduct

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1 by high Scientology officials on their, and Scientology's rela-  
2 tionship with L. RON HUBBARD. It has been a policy of Church of  
3 Scientology organizations to conceal the true relationship between  
4 the various Scientology organizations and L. RON HUBBARD since at  
5 least 1971. This policy was adopted to insulate the higher level  
6 Scientology organizations and L. RON HUBBARD from liability for  
7 acts ordered, authorized or condoned by L. RON HUBBARD and such  
8 higher level Scientology organizations.

9  
10 18. Following the FBI raid in 1977 on Scientology's  
11 Guardian Office premises in Los Angeles and Washington, D.C., the  
12 people in senior positions in the CMO and the Guardian's Office of  
13 the CHURCH OF SCIENTOLOGY OF CALIFORNIA ordered and had carried  
14 out a massive campaign to locate and destroy all the evidence in  
15 every organization in the United States which showed L. RON  
16 HUBBARD's control of the Scientology organizations and their  
17 finances. I was involved in this campaign in Clearwater, Florida,  
18 at the La Quinta property and at Gilman Hotsprings. Hundreds of  
19 thousands of pages were destroyed. In early 1980, a commercial  
20 paper shredder was rented and operated day and night for over two  
21 weeks to destroy huge amounts of documents which showed L. RON  
22 HUBBARD's control over the activities of CHURCH OF SCIENTOLOGY  
23 organizations.

24  
25 19. Except for a four month period in 1977 L. RON  
26 HUBBARD resided in southern California since June 1976, at least  
27 until he disappeared in 1980. Additionally, the people who are  
28 considered L. RON HUBBARD's personal staff all reside in southern

1 California. Most of them at Gilman Hotsprings. Others work at  
2 Author Services, Inc. at 6464 Sunset Boulevard in Los Angeles.

3  
4 20. In December 1978, I was transferred from L. RON  
5 HUBBARD's staff at La Quinta, California to a former resort  
6 complex at Gilman Hotsprings, California (16925 Highway 79,  
7 San Jacinto) which L. RON HUBBARD ordered purchased as a home for  
8 himself and his children as well as his business office.

9  
10 21. I worked on renovating the house and offices to his  
11 exact specifications, which he communicated to me; e.g., decorat-  
12 ing the house and office spaces, getting furniture specially made,  
13 installing electronic equipment, contracting for weaving tapes-  
14 tries according to his orders, etc.

15  
16 22. By 1979 I was in charge of L. RON HUBBARD's per-  
17 sonal household unit at Gilman Hotsprings.

18  
19 23. Whenever L. RON HUBBARD came to the Gilman Hot-  
20 springs property he was secreted in a panel van and I had to  
21 ensure that he was not followed or seen, even by other staff at  
22 the property.

23  
24 24. During this time L. RON HUBBARD stored on the  
25 Gilman Hotsprings property his personal belongings moved from an  
26 earlier location which he left because of fears about service of  
27 process. His personal belongings consisted of, among other

28 ///

1 things, furniture, art pieces, household goods, papers and writ-  
2 ings, library of books, photographs and photographic equipment.  
3

4 25. L. RON HUBBARD approved the funds for the entire  
5 Gilman Hotsprings renovation done to his specifications, and I  
6 purchased the supplies with it. The money came from the CHURCH OF  
7 SCIENOTOLOGY OF CALIFORNIA.  
8

9 26. The Gilman Hotsprings project was completed in  
10 1981.  
11

12 27. On the California La Quinta and Gilman Hotsprings  
13 properties we were required to destroy, in addition to materials  
14 which showed L. RON HUBBARD's control of Scientology and his  
15 connection with the Guardian's Office, any dispatches or memos to  
16 and from L. RON HUBBARD which showed he lived on these properties,  
17 intended to live there or had issued orders to do with these  
18 properties. At Gilman Hotsprings I was required to destroy all  
19 the memos I had received from L. RON HUBBARD ordering work to be  
20 done on his house and offices. I was required to destroy any  
21 orders from L. RON HUBBARD for items to be purchased for him or  
22 for his house or offices. I was required to destroy any dispatch  
23 or memo from anyone which mentioned the house and office spaces as  
24 being L. RON HUBBARD's. In early 1980, when a raid by government  
25 agencies was announced as threatened at Gilman Hotsprings, a  
26 commercial paper shredder was rented, brought to the property and  
27 operated day and night for over two weeks to destroy the massive  
28 pile of evidence which linked L. RON HUBBARD to Scientology

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1 organizations, Guardian's Office operations and the properties in  
2 southern California.

3  
4 28. I am personally familiar with Lyman Spurlock. He  
5 is currently an executive with Author Services, Inc. I have  
6 personal knowledge that Mr. Spurlock was with L. RON HUBBARD as  
7 part of the Hubbard inner sanctum in La Quinta, California, in the  
8 late 1970s. From at least 1979 onward, Mr. Spurlock worked  
9 directly for L. RON HUBBARD as Investment Officer International of  
10 the CHURCH OF SCIENTOLOGY OF CALIFORNIA as L. RON HUBBARD's  
11 personal investment officer. He was the highest financial officer  
12 of the CHURCH OF SCIENTOLOGY OF CALIFORNIA, and he was responsible  
13 to L. RON HUBBARD directly.

14  
15 Mr. Spurlock was, at least until I left the Scien-  
16 tology organization in December 1981, a member of the Sea Organi-  
17 zation of the CHURCH OF SCIENTOLOGY OF CALIFORNIA. Recently,  
18 Mr. Spurlock has represented that he has been concurrently an  
19 executive of the CHURCH OF SCIENTOLOGY OF CALIFORNIA and an  
20 employee and executive of Author Services, Inc.

21  
22 I was present during Mr. Spurlock's testimony in  
23 the case of Church of Scientology of California v. Gerald Arm-  
24 strong, Case No. C 420 153, in May-June 1984, and a true and  
25 correct copy of his testimony is appended as Exhibit "17".

26  
27 29. I was present during Mr. Homer Schomer's testimony  
28 in the case of Church of Scientology of California v. Gerald

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1 Armstrong, Case No. C 420 153, in May-June 1984, and a correct  
2 copy of his testimony is appended as Exhibit "12" to these papers.

3  
4 30. Exhibit "9" is a true and correct copy of HCO  
5 standing orders No. 1 and No. 2, issued by L. RON HUBBARD in 1961  
6 that "all mail addressed to me shall be received by me" and that  
7 all Scientology organizations have a message box so that any  
8 messages for L. RON HUBBARD may be received by him. This was  
9 Scientology policy for the eleven years I was a member of the Sea  
10 Org. This order was followed for more than a year after L. RON  
11 HUBBARD went into hiding in March 1980.

12  
13 31. Exhibit "8" is a true and correct copy of Scien-  
14 tology advertisements signed by L. RON HUBBARD which list  
15 addresses for receiving communications to L. RON HUBBARD at the  
16 CHURCH OF SCIENTOLOGY OF CALIFORNIA (1413 North Berendo Street,  
17 Los Angeles, California 90027) and Flag Operations Liaison Office  
18 (4833 Fountain Avenue, Los Angeles, California 90028). Flag  
19 Operations Liaison Office is a branch of the CHURCH OF SCIENTOLOGY  
20 OF CALIFORNIA.

21  
22 32. According to written Scientology policy, the  
23 Commodore's Messengers are emissaries of L. RON HUBBARD, and  
24 whatever is said to that messenger is being said to L. RON  
25 HUBBARD--they are the same. Whatever is done by that messenger is  
26 done by L. RON HUBBARD. The CMO orders (because they are L. RON  
27 HUBBARD's orders) must be followed by all Scientologists, accord-  
28 ing to Flag Order 3729 of September 15, 1978, by L. RON HUBBARD.

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This L. RON HUBBARD order was submitted into evidence in the case of Church of Scientology of California v. Gerald Armstrong, Case No. C 420 153, and was never shown to be overruled or rescinded. A true and correct copy of Flag Order 3729 (ED 106 CMO) by L. RON HUBBARD of September 15, 1978, known to me personally as such, is appended as Exhibit "18".

33. I am the defendant and cross-complainant in Church of Scientology of California v. Gerald Armstrong, Case No. C 420 152, Los Angeles Superior Court Central District. During the litigation of that case, Mary Sue Hubbard submitted a declaration dated January 26, 1983, in support of a motion for preliminary injunction. A true and correct copy of the January 26, 1983, declaration of Mary Sue Hubbard submitted to the court is appended as part of Exhibit "7" to these papers.

34. Vicky Livingston was a member of the Sea Organization of the CHURCH OF SCIENTOLOGY OF CALIFORNIA, and L. RON HUBBARD's personal accountant. Her position was to collect moneys due L. RON HUBBARD and make money for him from any source. I have reviewed the copies of invoices with "L. Ron Hubbard" printed at the top, attached hereto as Exhibit 6.

I am familiar with the signature of Vicky Livingston from working with her on L. RON HUBBARD's personal

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staff in the 1970's. All but one of the 26 invoice copies attached as Exhibit 6 are signed by Vicky Livingston.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 29th day of October, 1984, at Los Angeles, California.

  
GERALD ARMSTRONG  
Declarant